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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al., Case
No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED IN
CONNECTION WITH DEFENDANTS'
OMNIBUS MOTIONS *IN LIMINE* AND
PLAINTIFFS' RESPONSES THERETO**

Judge: Hon. James Donato

Pursuant to Civil Local Rules 7-11 and 79-5(c-f), Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google Asia Pacific Pte. Ltd., and Google Payment Corp. (collectively, “Google”) respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in Connection with Defendants’ Omnibus Motions *in Limine* and Plaintiffs’ Responses Thereto (“Motion to Seal”). The excerpts at issue in this Motion to Seal are sourced from documents that are designated as “NON-PARTY HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY” pursuant to the Protective Order entered by the Court, ECF No. 248.

Subsection (f) of Civil Local Rule 79-5 sets forth procedures that apply when a party seeks to file information designated as confidential by another party. Under subsection (e), the “motion must identify each document or portions thereof for which sealing is sought” and “serve the motion on the Designating Party the same day the motion is filed.” Pursuant to subsection (f)(1), the Designating Party has seven days to “file a statement and/or declaration” to establish why such designated material should be kept under seal pursuant to subsection (c)(1) of Civil Local Rule 79-5.

Civil Local Rule 79-5 provides that documents, or portions thereof, may be sealed if a party establishes that the documents are privileged, protectable as a trade secret, or otherwise entitled to protection under the law.

Google identifies the following portions of Plaintiffs’ Oppositions and supporting papers filed in connection with Defendants’ Omnibus Motions *in Limine* and Plaintiffs’ Responses Thereto as containing information designated as confidential by another party:

Document	Portion Containing Designated Information	Designating Party
Exhibit 4 to Even Decl.	Entire Document.	Non-Party ¹
Exhibit 5 to Even Decl.	Entire Document.	Non-Parties

¹ Identifying the designating parties, in the case of non-parties, would itself reveal the specific confidential information the non-party may seek to seal pursuant to Local Rule 79-5(f), so the identities of certain designating non-parties has not been included in this filing.

Document	Portion Containing Designated Information	Designating Party
Exhibit 9 to Even Decl.	Page -085 (all text in row to the right of “not published”). Page -125 (3rd developer listed in first column).	Non-Parties
Exhibit 10 to Even Decl.	Entire Document.	Non-Party
Exhibit 12 to Even Decl.	Page -636	Non-Party
Exhibit 14 to Even Decl.	Pages -237 to -238 (the final paragraph of the page continuing onto the next page until “CEO”).	Non-Party

Dated: October 5, 2023

By: /s/ Justin P. Raphael
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